

EXHIBIT 109

4/3/2025

Richard Kadrey, et al. v. Meta Platforms, Inc.
Highly Confidential

Chaya Nayak 30(b)(6)

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, AN	:	CASE NO. 3:23-cv-03417-VC
INDIVIDUAL; SARAH SILVERMAN,	:	
AN INDIVIDUAL; CHRISTOPHER	:	
GOLDEN, AN INDIVIDUAL,	:	
PLAINTIFFS	:	
	:	
VS.	:	
	:	
META PLATFORMS, INC., A	:	
DELAWARE CORPORATION	:	
DEFENDANT	:	

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
VIDEOTAPED DEPOSITION OF CHAYA NAYAK 30(B)(6)
SAN FRANCISCO, CALIFORNIA
THURSDAY, APRIL 3, 2025

REPORTED BY:
DEBBIE LEONARD, CSR, RDR, CRR
CSR NO. 14350

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1 there was another copy.

2 BY MR. SCHUFFENHAUER:

3 Q Do you know why Meta would acquire multiple
4 copies of LibGen?

5 MR. MORTON: Object to form. Outside the scope.

6 THE WITNESS: Meta is a large company, and I
7 could imagine that one researcher could have downloaded
8 it and then another researcher could have downloaded it
9 without knowing that it existed.

10 BY MR. SCHUFFENHAUER:

11 Q Do you know which copy of LibGen was used in
12 training the Llama models?

13 MR. MORTON: Objection. Outside the scope.
14 Object to form.

15 THE WITNESS: I do not know.

16 BY MR. SCHUFFENHAUER:

17 Q Do you know if every copy of LibGen was used to
18 train a Llama model that Meta has?

19 MR. MORTON: Object to form. Outside the scope.

20 THE WITNESS: I don't know.

21 BY MR. SCHUFFENHAUER:

22 Q Would you expect it to be the case that every
23 copy of LibGen was used to train a Llama model that Meta
24 possesses?

25 MR. MORTON: Object to form. Outside the scope.

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C E R T I F I C A T E

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I, Debbie Leonard, Certified Shorthand Reporter

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No. 14350 for the State of California, do hereby

5

certify:

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That the foregoing deposition was taken before me

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at the time and place therein set forth, at which time

8

the witness was put under oath by me; that the testimony

9

of the witness and all objections made at the time of the

10

examination were recorded stenographically by me, were

11

thereafter transcribed by me by means of computer; and

12

that the foregoing is a true record of same.

13

I further certify that I am neither counsel for

14

nor related to any party to said action, nor in any way

15

interested in the outcome thereof.

16

IN WITNESS WHEREOF, I have subscribed my name


17

this 3rd day of April, 2025.

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Debbie Leonard, CSR, RDR, CRR

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CSR NO. 14350

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